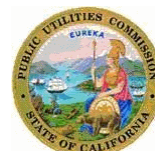


**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



**FILED**

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Order Instituting Rulemaking Regarding Policies, Procedures and Rules for Development of Distribution Resources Plans Pursuant to Public Utilities Code Section 769.	Rulemaking 14-08-013 (Filed August 14, 2014)
And Related Matters.	Application 15-07-002 Application 15-07-003 Application 15-07-006
<b>(NOT CONSOLIDATED)</b>	
In the Matter of the Application of PacifiCorp (U901E) Setting Forth its Distribution Resource Plan Pursuant to Public Utilities Code Section 769.	Application 15-07-005 (Filed July 1, 2015)
And Related Matters.	Application No. 15-07-007 Application No. 15-07-008

**COMMENTS OF MARIN CLEAN ENERGY  
ON THE JOINT ASSIGNED COMMISSIONER AND ADMINISTRATIVE LAW  
JUDGE'S RULING REGARDING TRACK 2 DEMONSTRATION PROJECTS**

PUBLIC VERSION  
(Section III. B. Confidential)

C.C. Song  
Regulatory Analyst  
MARIN CLEAN ENERGY  
1125 Tamalpais Avenue  
San Rafael, CA 94901  
Telephone: (415) 464-6018  
Facsimile: (415) 459-8095  
E-Mail: [csong@mceCleanEnergy.org](mailto:csong@mceCleanEnergy.org)

July 22, 2016

## TABLE OF CONTENTS

<b>I. Introduction .....</b>	<b>1</b>
<b>II. Background .....</b>	<b>2</b>
<b>III. Comments on Demonstration Projects .....</b>	<b>3</b>
<b>A. Center for Sustainable Energy Integrated Community and Grid Planning Project .....</b>	<b>3</b>
<b>■ [REDACTED] .....</b>	<b>3</b>
<b>IV. Conclusion .....</b>	<b>4</b>

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**I. INTRODUCTION**

Pursuant to the directions set forth in the *Joint Assigned Commissioner and Administrative Law Judge’s Ruling Regarding Track 2 Demonstration Projects* (“Ruling”) issued on May 17, 2016, Marin Clean Energy (“MCE”) respectfully submits the following comments on the Ruling.

MCE is the first operational Community Choice Aggregator (“CCA”) in California, and its mission is to address climate change by reducing energy related greenhouse gas emissions. MCE currently serves approximately 175,000 customer accounts in Marin County, unincorporated Napa

County, and the cities of Richmond, San Pablo, El Cerrito, and Benicia and will begin serving cities and towns of Napa County and cities of Walnut Creek and Lafayette in Contra Costa County in 2016. The inclusion of these communities will increase MCE's total customer accounts to approximately 250,000.

## **II. BACKGROUND**

As a Load-Serving Entity ("LSE"), MCE has several local programs that aim to increase the adoption of Distributed Energy Resources ("DER"). MCE currently administers \$1.2 million in ratepayer funded energy efficiency (EE) programs, focusing on hard to reach customer segments. MCE supports local renewable energy development through the Feed-in Tariff ("FIT") program, which purchases energy from 2 MW of local rooftop solar, with another 10 MW currently under construction. MCE has partnered with many third-party technology providers to administer pilot projects to help facilitate market deployment. These projects include Electric Vehicles ("EV"), Demand Response ("DR"), and Energy Storage ("ES"). Besides achieving the goal of reducing energy related greenhouse gas emissions, MCE also has an interest in deploying DERs in a manner that would reduce or defer grid upgrade needs to facilitate the integration of local renewable energy and to benefit ratepayers.

As a not-for-profit public agency, MCE has a unique perspective to offer on challenges that serve as barriers to DER implementation. MCE looks forward to working with the Commission, utilities, and other non-utility parties to develop DER deployment best practices to minimize the environmental impact of energy consumption in California.

Due to privacy concerns, MCE requests for the second section of these comments to be kept confidential pursuant to Commission Rule 11.4(A).

### **III. COMMENTS ON DEMONSTRATION PROJECTS**

#### **A. Center for Sustainable Energy Integrated Community and Grid Planning Project**

MCE recommends the approval of the Integrated Community and Grid Planning Project, a collaborative project proposed by the City and County of San Francisco’s Department of Environment and the Center for Sustainable Energy. The project seeks to develop best practices that can streamline the sharing of data and planning tools between Investor Owned Utilities (“IOUs”) and local governments that can lead to better alignment of local policies and consumer benefits.

MCE is supportive of the project because it can demonstrate how DER deployment can support local government planning goals, enable consumer choice, and develop local targeted incentives, rates and programs to encourage DER deployment at optimal locations. This proposal is especially important in light of the growth of CCAs in California, and all of them so far have adopted the goal of deploying more renewable energy and energy efficiency technologies to reduce Greenhouse Gas (“GHG”) emissions. Given that San Francisco recently launched its own CCA, CleanPowerSF, this demonstration project has the potential to help IOUs and CCAs statewide to understand various implementation opportunities and challenges related to DER deployment.

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#### IV. CONCLUSION

MCE thanks Assigned Commissioner Picker and Assigned Administrative Law Judge Allen for the opportunity to provide these comments on the Ruling.

Respectfully submitted,

/s/ C.C. Song

C.C. Song  
Regulatory Analyst  
MARIN CLEAN ENERGY  
1125 Tamalpais Avenue  
San Rafael, CA 94901  
Telephone: (415) 464-6018  
Facsimile: (415) 459-8095  
E-Mail: [csong@mceCleanEnergy.org](mailto:csong@mceCleanEnergy.org)

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